

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,
Plaintiffs,
v.

5:21-cv-844-XR

GREGORY W. ABBOTT, et al.,
Defendants.

OCA-GREATER HOUSTON, et al.,
Plaintiffs,
v.

1:21-CV-0780-XR

JANE NELSON, et al.,
Defendants.

**OCA PLAINTIFFS’ PARTIALLY OPPOSED MOTION TO EXTEND PAGE LIMIT
FOR MOTION FOR SUMMARY JUDGMENT TO INCLUDE FULL STATEMENT OF
UNCONTESTED FACTS**

TO THE HONORABLE XAVIER RODRIGUEZ, U.S. DISTRICT JUDGE:

Pursuant to this Court’s order in open court on May 16, 2023, dispositive motions in this consolidated litigation—at least as to impact claims—are currently due on May 26, 2023. Plaintiffs OCA-Greater Houston, League of Women Voters of Texas, and REVUP-Texas (“OCA Plaintiffs”) intend to move for summary judgment on their claims that SB 1’s ID matching provisions violate Section 101 of the Civil Rights Act of 1964, which are asserted against the Texas Secretary of State, the Harris County Elections Administrator, and the Travis County Clerk, in their official capacities.

The default page limit for such briefing is 30 pages, which includes a background statement of uncontested facts. *See* Fact Sheet for Judge Xavier Rodriguez, at 6 & ¶¶ 31, 36.¹ OCA Plaintiffs respectfully request the Court permit them to include their full statement of uncontested facts within the body of their motion, rather than as an appendix to that motion, by extending the page limit for their motion for summary judgment to 90 pages. This page limit which will be inclusive of all facts and argument presented, other than evidentiary exhibits.

OCA Plaintiffs conferred with counsel for the Texas Secretary of State, the GOP Intervenor-Defendants, and the Travis County Clerk, who do not oppose a page extension of up to 10 pages, but oppose any further extension. OCA Plaintiffs attempted to confer with counsel for the Harris County Elections Administrator but did not receive a response prior to the filing of this motion.

OCA Plaintiffs' request for a page-limit extension is made in good faith and not for the purpose of delay, and solely to permit them to include the full statement of uncontested facts in the body of their motion for summary judgment. OCA Plaintiffs do not intend to burden the Court with duplicative, cumulative, or unnecessary information. OCA Plaintiffs therefore respectfully request the Court extend the page limit for their motion for summary judgment to 90 pages.

Dated: May 23, 2023

/s/ Zachary Dolling

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TEXAS CIVIL RIGHTS PROJECT

¹ Available at <https://www.txwd.uscourts.gov/wp-content/uploads/2019/11/Court20Facts20for20US20District20Judge20Rodriguez-1.pdf>.

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CERTIFICATE OF SERVICE

On May 23, 2023, I filed the foregoing using the CM/ECF system of the Western District of Texas, which will send notification of this filing to counsel of record.

/s/ Zachary Dolling

CERTIFICATE OF CONFERENCE

On May 22, 2023, and May 23, 2023, counsel for OCA Plaintiffs conferred with counsel for the Texas Secretary of State, counsel for the GOP Intervenor-Defendants, and counsel for the Travis County Clerk, who do not oppose a page extension of up to 10 pages, but oppose any further extension. OCA Plaintiffs attempted to confer with counsel for the Harris County Elections Administrator but did not receive a response prior to the filing of this motion.

/s/ Zachary Dolling